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February 14, 2024

**United States District Court** WESTERN DISTRICT OF TEXAS CLERK, U.S. DISTRICT COURT

WESTERN DISTRICT OF TEXAS

DT

**EL PASO DIVISION** UNITED STATES OF AMERICA,

SEALED

Deputy Clerk

Plaintiff,

JESSE GARAY,

v.

Defendant.

Case No: EP:24-CR-00311-FM

## UNITED STATES' MOTION TO DETAIN DEFENDANT WITHOUT BOND AND MOTION FOR CONTINUANCE

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

- 1. The Defendant has been charged by Indictment with a violation of Title 18, United States Code, Section 933(a)(3), Trafficking in Firearms, Title 18, United States Code, Section 922(a)(1)(A), Dealing Firearms Without a License and twelve counts of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), False Statement During a Firearm Acquisition.
- 2. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.
- 3. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.

The Government would further move the Court for a three day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA UNITED STATES ATTORNEY

By:

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